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CJB-8865  
Attorney for Plaintiff

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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DIGNA TINEO, : NOTICE OF MOTION  
 : FOR ATTORNEYS FEES  
Plaintiff, : PURSUANT TO  
 : 28 U.S.C. § 2412  
 :  
-against- : 19 Civ.9273 VSB SLC  
 :  
ANDREW M. SAUL, Commissioner :  
of the Social Security Administration, :  
 :  
Defendant. :  
-----X

PLEASE TAKE NOTICE that upon the accompanying Declaration of Christopher James Bowes, dated January 7, 2021, plaintiff will move this Court before the Honorable Sarah L. Cave, United States Magistrate Judge, presiding, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, NY 10007, on submission, for an order:

(1) Accepting plaintiff's application for reasonable attorney's fees and costs pursuant to the Equal Access to Justice Act ("EAJA"), 28 U.S.C. §2412(d), as timely filed;

(2) Granting plaintiff leave to defer filing a memorandum of law in support of his application for fees for a period of 60

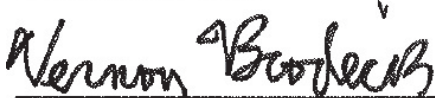
days to permit the parties an opportunity to reach settlement of the fee issue; and

(3) for such other and further relief as this Court may deem just and proper.

Dated: Shoreham, New York  
January 7, 2021

I am in receipt of Plaintiff's notice of motion for attorney's fees and the declaration of Christopher James Bowes in support of that motion. (Docs. 28, 29.) I will accept Plaintiff's application for reasonable attorney's fees and costs pursuant to the Equal Access to Justice Act, 28 U.S.C. §2412(d), as timely filed. Additionally, Plaintiff is granted to leave to defer filing a memorandum of law in support of the application for fees for a period of 60 days to permit the parties an opportunity to reach settlement of the fee issue.

**SO ORDERED:**



**HON. VERNON S. BRODERICK** 2/1/2021  
**UNITED STATES DISTRICT JUDGE**

Respectfully submitted,

/s/Christopher James Bowes

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To: United States Attorney for the  
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